



02-8611-07-PA

POTENTIAL HAZARDOUS WASTE SITE**PRELIMINARY ASSESSMENT**Peerless Property
Site NameNYD980641138
EPA Site ID Number3850 Review Avenue
Long Island City, Queens, New York
Address02-8611-07
TDD Number**COMPLETED****Date of Site Visit:** Offsite reconnaissance 11/19/86**SITE DESCRIPTION**

Peerless Property is an active site of approximately 5 acres currently occupied by H.D. Sherman Co., Inc. Industrial Valves and Supplies, and W.E. Williams Valve Corp. The building is located in an industrial area on Review Avenue. The facility consists of a small office area in the front and an attached warehouse to the rear. The building is bound by warehouses to the north, east and west. The majority of the property is paved. The property slopes to the south toward the Newtown Creek, which is about 100 yards from the building. A railroad track crosses the property somewhere between the building and the creek. Across the road to the south is a 15 foot stone wall and the Calvary Cemetery. Before 1972, unknown amounts of xylene and toluene were handled and stored at this facility. Accidental leaks or spills may have occurred.

PRIORITY FOR FURTHER ACTION: High ☐ Medium ☐ Low ☒**RECOMMENDATIONS**

A site inspection is recommended on a time available basis. The area is largely industrial and the groundwater is not used for drinking purposes. There is a slight potential for contamination of Newtown Creek from substances that may have been spilled or leaked on the site.

Prepared by: James Lang
of NUS Corporation**Date:** 11/24/86

193054



POTENTIAL HAZARDOUS SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE LOCATION AND INSPECTION INFORMATION

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
NY D980641138

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) 02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
Peerless Property 3850 Review Avenue
03 CITY 04 STATE 05 ZIP CODE 06 COUNTY 07 COUNTY 08 CONG DIST.
Long Island City NY 11101 Queens 081 09
09 COORDINATES
LATITUDE LONGITUDE
4 00 4 4' 3 0". N 0 7 30 5 7' 3 0". W

10 DIRECTIONS TO SITE (Starting from nearest public road)

Cross the Kosciuszko Bridge on the Brooklyn-Queens Expressway to the Long Island Expressway West. Exit left on Greenpoint Avenue. Make a left onto Review Avenue. Building is on the right.

III. RESPONSIBLE PARTIES

01 OWNER (if known) 02 STREET (Business, mailing, residential)
Charter International Oil Company 8938 Manchester Avenue, P.O. Box 5008
03 CITY 04 STATE 05 ZIP CODE 06 TELEPHONE NUMBER
Houston TX 77012 (713) 923-3300
07 OPERATOR (if known and different from owner) 08 STREET (Business, mailing, residential)
09 CITY 10 STATE 11 ZIP CODE 12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE ☐ B. FEDERAL: (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER: (Specify) ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED: / / ☒ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: 6/09/86
☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION BY (Check all that apply)
☐ YES DATE: / / ☐ A. EPA ☐ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☒ NO ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: (Specify)
CONTRACTOR NAME(S):

02 SITE STATUS (Check one) 03 YEARS OF OPERATION
☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN Unknown / Present UNKNOWN
BEGINNING ENDING

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Unknown amounts of xylene and toluene and other solvents may have leaked or been spilled on the property.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

A potential hazard exists to the Newtown Creek which runs behind the site. If the solvents were spilled or leaked, they may contaminate the waterway.

IV. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste information and Part 3 - Description of Hazardous Conditions and Incidents)

☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☒ C. LOW (Inspection on time available basis) ☐ D. NONE

(No further action needed. complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT 02 OF (Agency/Organization) 03 TELEPHONE NUMBER
Diana Messina U.S. EPA Region II, Edison, NJ (201) 321-6685

04 PERSON RESPONSIBLE FOR ASSESSMENT 05 AGENCY 06 ORGANIZATION 07 TELEPHONE NUMBER 08 DATE
James Lang U.S. EPA NUS FIT II (201) 225-6160 11/24/86

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

1. IDENTIFICATION
01 STATE 02 SITE NUMBER
NY D980641138

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)		02 WASTE QUANTITY AT SITE	03 WASTE CHARACTERISTICS (Check all that apply)		
- A. SOLID	E. SLURRY	(Measures of waste quantities must be independent)	- A. TOXIC	E. SOLUBLE	I. HIGHLY VOLATILE
- B. POWDER, FINES <input checked="" type="checkbox"/>	F. LIQUID		- B. CORROSIVE	- F. INFECTIOUS <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> J. EXPLOSIVE
- C. SLUDGE	G. GAS		- C. RADIOACTIVE <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> G. FLAMMABLE	- K. REACTIVE
- D. OTHER: _____			- D. PERSISTENT <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> H. IGNITABLE	- L. INCOMPATIBLE
(Specify)		TONS _____	- M. NOT APPLICABLE		
		CUBIC YARDS _____			
		NO. OF DRUMS <u>Unknown</u>			

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS	Unknown		
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
SOL	Xylene	1330-20-7	Unknown	Unknown	Unknown
SOL	Toluene	108-88-3	Unknown	Unknown	Unknown

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	N/A		FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (See specific references. e.g., state files, sample analysis, reports)

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

1. IDENTIFICATION
01 STATE 02 SITE NUMBER
NY 0980641138

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION 02 OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: Unknown 04 NARRATIVE DESCRIPTION

There is a very slight potential for groundwater contamination. The groundwater is not used for drinking in the area.

01 ☒ B. SURFACE WATER CONTAMINATION 02 OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: Unknown 04 NARRATIVE DESCRIPTION

There is a very slight potential for contamination of Newtown Creek which is approximately 100 yards down slope from the site. The waterway is used for light shipping.

01 ☒ C. CONTAMINATION OF AIR 02 OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: Unknown 04 NARRATIVE DESCRIPTION

There is a very slight potential for contamination of air from material spilled on-site.

01 ☒ D. FIRE/EXPLOSIVE CONDITIONS 02 OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: Unknown 04 NARRATIVE DESCRIPTION

There is a very slight potential for fire from material spilled on-site.

01 ☒ E. DIRECT CONTACT 02 OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: Unknown 04 NARRATIVE DESCRIPTION

There is a very slight potential for direct contact with material spilled on-site.

01 ☒ F. CONTAMINATION OF SOIL 02 OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: 5 04 NARRATIVE DESCRIPTION
(ACRES)

There is a very slight potential for soil contamination from material spilled on the site. The majority of the site is paved.

01 ☐ G. DRINKING WATER CONTAMINATION 02 OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0 04 NARRATIVE DESCRIPTION

There is no potential for drinking water contamination. Neither Newtown Creek nor the groundwater in the area is used for drinking purposes.

01 ☒ H. WORKER EXPOSURE/INJURY 02 OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: Unknown 04 NARRATIVE DESCRIPTION

There is a very slight potential for worker exposure since the site is active.

01 ☒ I. POPULATION EXPOSURE/INJURY 02 OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

There is a slight potential for population exposure or injury from materials that may have been spilled on the site.

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

1. IDENTIFICATION
01 STATE 02 SITE NUMBER
NY D980641138

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 J. DAMAGE TO FLORA 02 _ OBSERVED (DATE: _____) _ POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

There is no potential for damage to flora from material spilled on-site. No flora exists on the site.

01 X K. DAMAGE TO FAUNA 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)

There is a slight potential for damage to the fauna in the Newtown Creek from materials that may have been spilled on-site.

01 X L. CONTAMINATION OF FOOD CHAIN 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

There is a slight potential for contamination to the food chain in the Newtown Creek from materials that may have been spilled on-site.

01 X M. UNSTABLE CONTAINMENT OF WASTES 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
(Spills/runoff/standing liquids/leaking drums)
03 POPULATION POTENTIALLY AFFECTED: Unknown 04 NARRATIVE DESCRIPTION

Materials may have been spilled from containers stored on-site.

01 X N. DAMAGE TO OFFSITE PROPERTY 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

There is a very slight potential for damage to offsite property from material spilled on-site.

01 X O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

There is a very slight potential for contamination of sewers through runoff in storm drains.

01 X P. ILLEGAL/UNAUTHORIZED DUMPING 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

There is the potential for illegal or unauthorized dumping because there is no fence around the site.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None

III. TOTAL POPULATION POTENTIALLY AFFECTED: Unknown

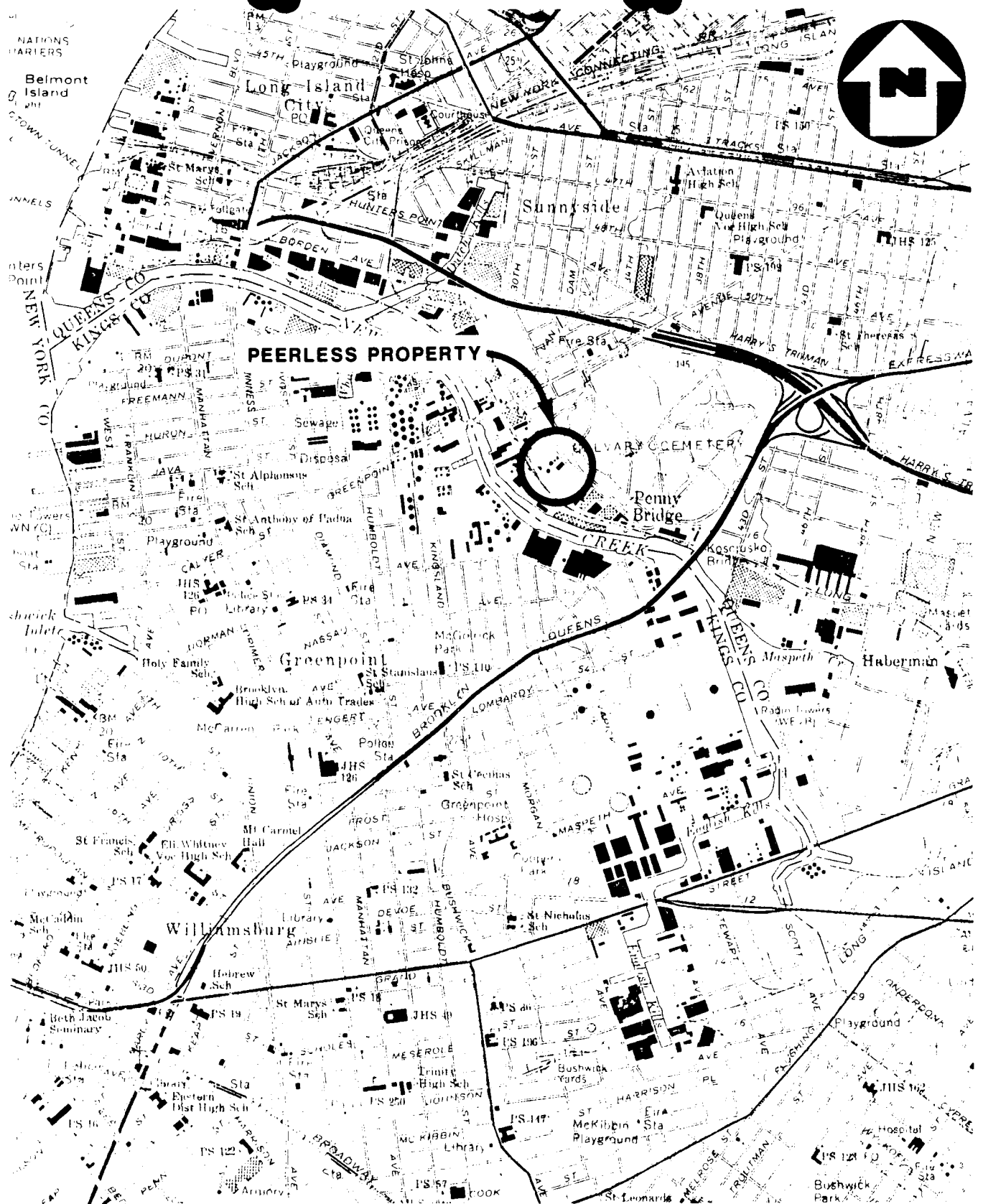
IV. COMMENTS

None

V. SOURCES OF INFORMATION (Cite specific references. e.g., state files, sample analysis, reports)

Offsite Reconnaissance, NUS FIT Region II, 11/19/86
New York Water Supply Company
New York Department of Environmental Conservation at Stony Brook

APPENDIX A
MAPS AND PHOTOS

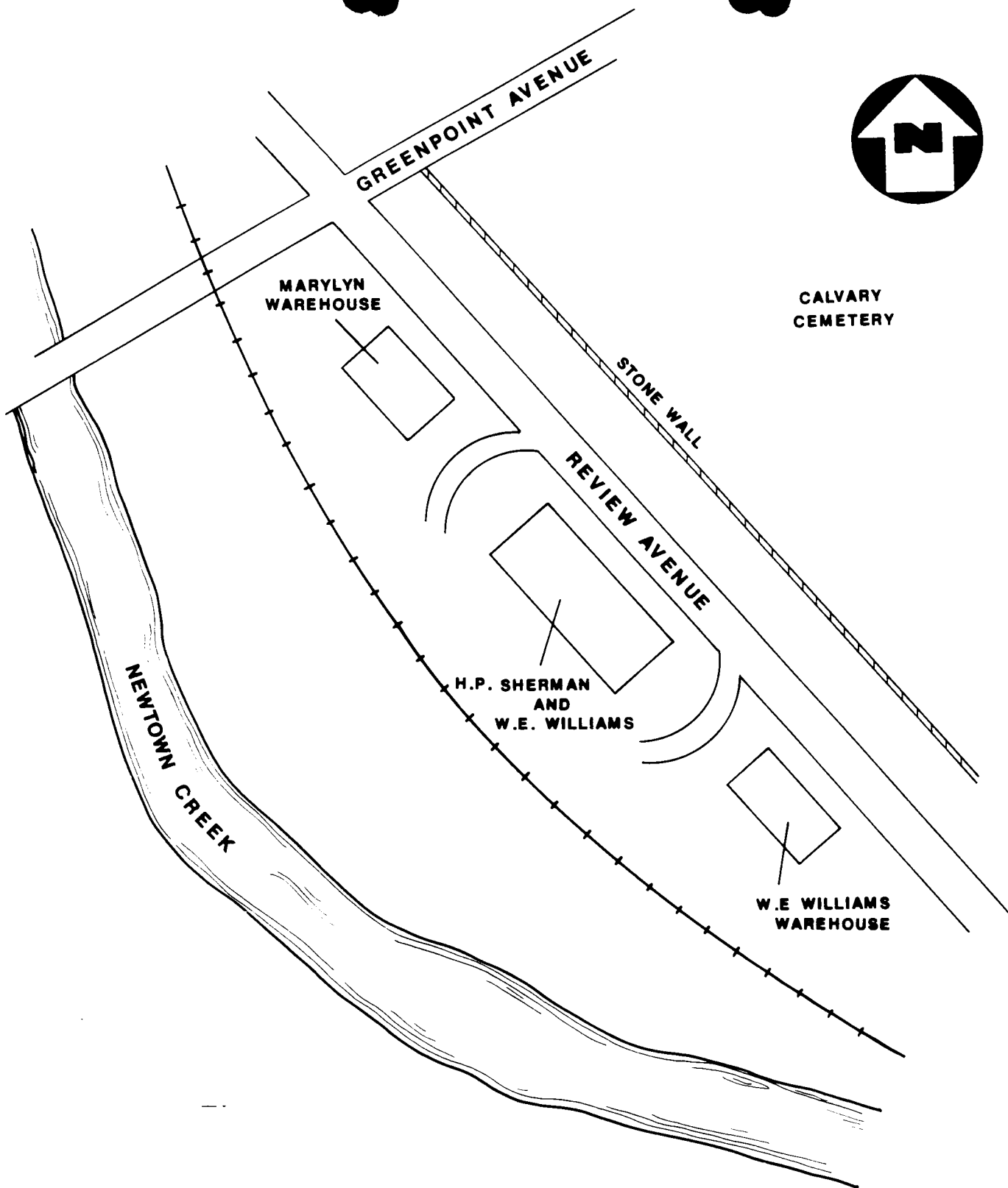


SITE LOCATION MAP
PEERLESS PROPERTY, LONG ISLAND CITY, N.Y.

(SCALE UNKNOWN)

FIGURE 1





SITE MAP
PEERLESS PROPERTY, LONG ISLAND CITY, N.Y.
(NOT TO SCALE)

FIGURE 2

PEERLESS PROPERTY
LONG ISLAND CITY, NEW YORK
TDD# 02-8611-07
NOVEMBER 19, 1986

PHOTOGRAPH INDEX

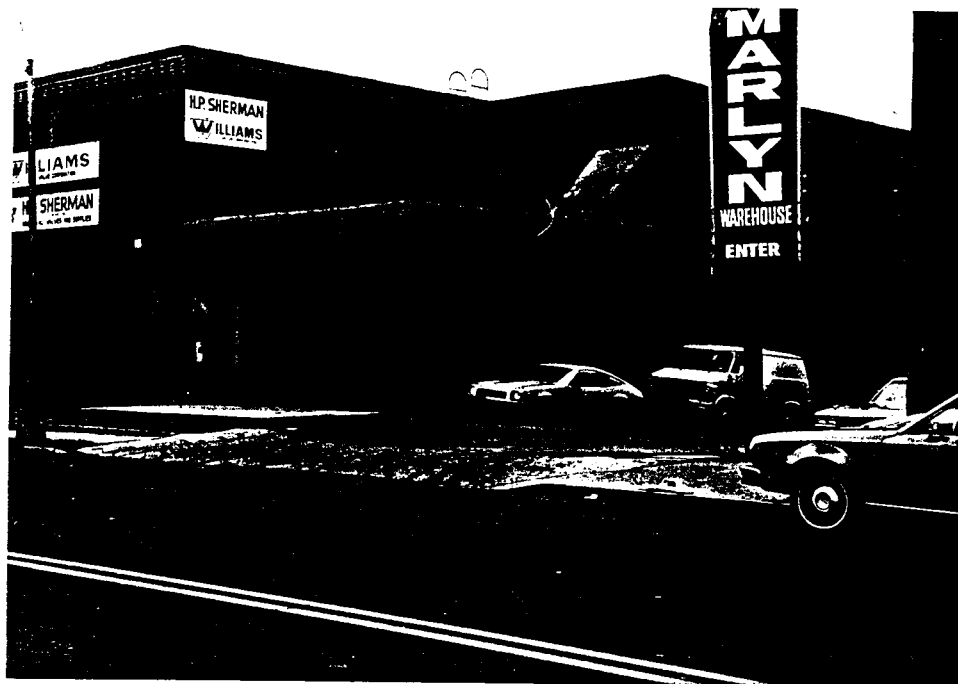
PEERLESS PROPERTY
LONG ISLAND CITY, NEW YORK
TDD# 02-8611-07
NOVEMBER 19, 1986

PHOTOGRAPH INDEX

ALL PHOTOGRAPHS TAKEN BY JAMES LANG

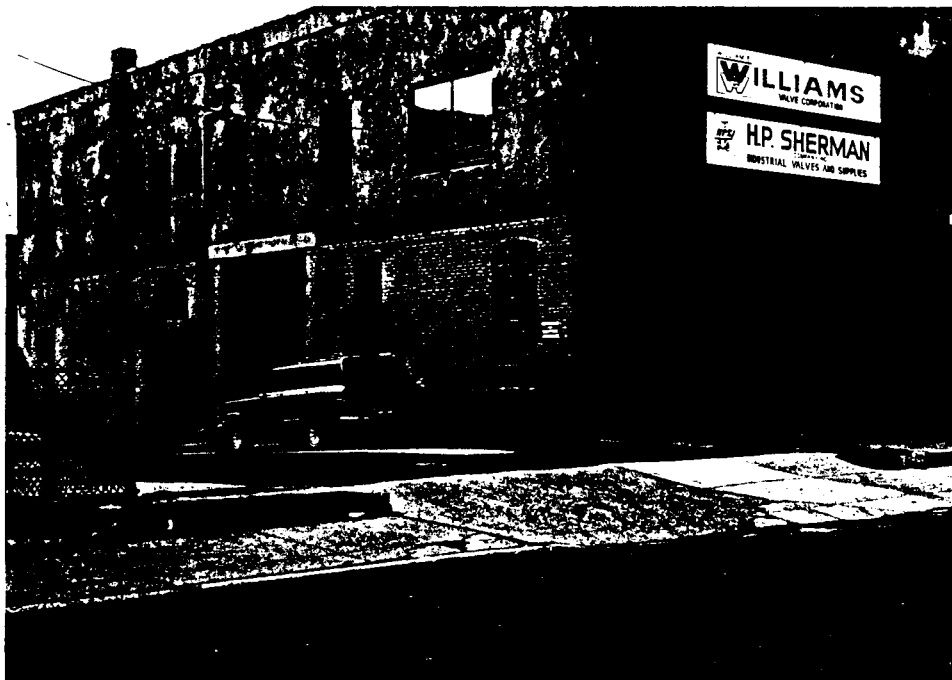
<u>Photo Number</u>	<u>Description</u>	<u>Time</u>
1P-18	Looking southeast at Peerless Property	1120
1P-19	Looking southwest at Peerless Property	1121

PEERLESS PROPERTY, LONG ISLAND CITY, NEW YORK



1P-18

November 19, 1986 1120
Looking southeast at Peerless Property
Photographer: James Lang



1P-19

November 19, 1986 1121
Looking southwest at Peerless Property
Photographer: James Lang

APPENDIX B
BACKGROUND INFORMATION



Charter International Oil Company
8938 Manchester Avenue • Post Office Box 5008
Houston, Texas 77012
Telephone 713-923-3300 • Telex 762-312

June 9, 1981

Regional Administrator
U. S. EPA Region 2
Sites Notification
26 Federal Plaza
New York, NY. 10278

Gentlemen:

Attached is the "Notification of Hazardous Waste Site" form for operations owned and/or operated by Charter International Oil Company. This Notification contain(s) proprietary commercial information which is exempt from public disclosure under the Freedom of Information Act and 18 U.S.C. section 1905.

Sincerely,

B F Stanley
B. F. Stanley
Senior Vice-President

BFS/jp



Notification of Hazardous Waste Site

2 of 3
United States
Environmental Protection
Agency
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

NYS 000 001 155

A Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name Charter International Oil Company
Street P.O. Box 5008
City Houston State Texas Zip Code 77012

NYD980641138

B Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site Peerless Property
Street 3850 Review Ave.
City Long Island County Queens State N.Y. Zip Code 11101

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title) Cox, Lyman, Mgr. Environmental Affairs
Phone (713) 923-3427

D Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

Not applicable

From (Year) To (Year)

E Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☐ Organics
2. ☐ Inorganics
3. ☒ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

Source of Waste:
Place an X in the appropriate boxes.

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☒ Other (Specify)
bulk chemical
terminal

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

F Waste Quantity:
Place an X in the appropriate boxes to indicate the facility types found at the site.
In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.
In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type
1. ☐ Piles
2. ☒ Land Treatment
3. ☐ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☒ Other (Specify) leaks

Total Facility Waste Amount
cubic feet unknown
gallons _____
Total Facility Area
square feet _____
acres 5

G Known, Suspected or Likely Releases to the Environment:
Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☐ None

unknown

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

Terminal operations ceased in 1972, prior to acquisition of the property by Charter International Oil Co.

J Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name B. F. Stanley, Sr. Vice-President

Street _____

City _____

State _____

Zip Code _____

Signature B. F. Stanley

Date _____

- ☒ Owner, Present
☐ Owner, Past
☐ Transporter
☐ Operator, Present
☐ Operator, Past
☐ Other

ATTACHMENT TO EPA FORM 8900-1

SITE ADDRESS: (Peerless Property
3850 Review Ave.
Long Island, N.Y.

In accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, Charter International Oil Company, by submission of this letter and the attached EPA Form 8900-1, hereby notifies the Environmental Protection Agency of the possibility of a hazardous waste site at 3850 Review Ave., Long Island, N.Y..

This notification is submitted although our present knowledge, belief, recollection, and available records indicate that no hazardous waste has ever been deliberately disposed of at this site. Also, to the best of our knowledge and recollection, no significant release of a hazardous substance has occurred at this site.

However, the hazardous materials xylene and toluene have been handled and stored at this address, and incidental or accidental leaks or spills involving either or both of these substances may have occurred.

Certified Mail -Return Receipt Requested

Charter International Oil Company
c/o Timothy Sleeth, Esq.
P.O. Box 53315
Jacksonville, Florida 32201-3315

Re: Request for Confidentiality Concerning Information Submitted
by Charter International Oil Company on June 9, 1981.

Dear Mr. Sleeth:

As I mentioned in our telephone conversations of November 1, 1991 and November 8, 1991, the United States Environmental Protection Agency ("EPA") has received a request for information which would include the information referenced above. I faxed a copy to you on November 1, 1991 of the above-referenced information which had been submitted by Charter International Oil Company ("Charter") in 1981. I stated at that time that it was my preliminary assessment that the passage of ten years and the changes in environmental law in this ten year period had rendered Charter's request for confidentiality moot. I requested that if you concurred with this assessment that you fax an acknowledgement to that effect so that the information could be released. In our second conversation on November 8, 1991 you stated that you would have a response to me within a few days. I have not heard from you since.

Therefore, by this letter, EPA is formally providing Charter with notice that we are determining whether the subject information is entitled to confidential treatment. If Charter wishes to maintain the information submitted as confidential, it must provide notice to this office within 15 days from your receipt of this letter. Such a notice may be addressed to my attention.

Any such notice to be submitted by Charter should, in accordance with 40 C.F.R. §2.204(e) address the following comments, at a minimum: (i) the portions of the information which are alleged to be entitled to confidential treatment; (ii) the period of time for which confidential treatment is desired; (iii) measures taken by Charter to guard against undesired disclosure of the information to others; (iv) the extent to which the information has been disclosed to others, and the precautions taken in connection therewith; and (v) whether the business asserts that disclosure of the information would be likely to result in

substantial harmful effects on the business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

You should note that, as relevant, you may claim confidentiality with respect to information submitted in support of your request for confidentiality. See 40 C.F.R. §2.205(c). Any such information submitted will be released only in accordance with the procedures specified in 40 C.F.R. Part 2; 40 C.F.R. § 2.203(a).

You should also be aware that, as provided by 40 C.F.R. §2.204(e), the failure by Charter to submit comments within 15 working days of receipt of this letter will be construed by EPA as a waiver of Charter's claim of confidentiality.

Should you have any questions concerning the above, you may contact me at the above address, by telephone at (212) 264-5342 or by fax at (212) 264-4359.

Sincerely yours,

George A. Shanahan
Assistant Regional Counsel

DEC 06 1991

Shanahan

LAW OFFICES
SMITH HULSEY & BUSEY
1800 FIRST UNION NATIONAL BANK TOWER
225 WATER STREET
POST OFFICE BOX 53315
JACKSONVILLE, FLORIDA 32201-3315

GARTH A. ADAMS
WILLIAM H. BEAVER, II
DENNIS L. BLACKBURN
C. GUY BOND
AMY E. BURCH
STEPHEN D. BUSEY
DOUGLAS D. CHUNN
E. LANIER DREW
MUBA K. FARMAND
BRUCE J. FLETCHER
EARL E. GOODE, JR.
JEANNE E. HELTON
ALAN D. HENDERSON
MARK HULSEY
CYNTHIA C. JACKSON
G. PRESTON KEYES
WILLIAM E. KUNTZ
M. RICHARD LEWIS, JR.
MARIANNE LLOYD

RAYMOND R. MAGLEY
E. OWEN McCULLER, JR.
WALTER S. MILLSAPS
LAUREN PARBONS
JAMES H. POST
BRYAN L. PUTNALL
E. LANNY RUSSELL
JOEL BETTEMBRINI, JR.
TIM E. SLEETH
JOHN R. SMITH, JR.
AMY L. STAFFORD
BRUCE E. STUTSMAN
RICHARD R. THAMES
HERSCHEL T. VINYARD JR.
TIMOTHY W. VOLPE
WADDELL A. WALLACE III
MELISSA P. WEBB
HARRY M. WILSON, III

LLOYD SMITH
(1915-1987)

TELEPHONE
904-359-7700

FACSIMILE
904-359-7708
904-353-9808

December 2, 1991

George A. Shanahan, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region II
Jacob K. Javits Federal Building
New York, NY 10278

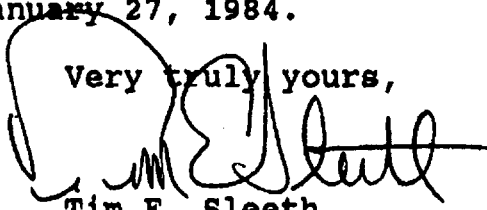
Re: Request for Confidentiality Concerning Information
Submitted by Charter International Oil Company on
June 9, 1981

Dear Mr. Shanahan:

In response to your letter of November 22, 1991, please be advised that Charter International Oil Company has no objection to the release of the documents faxed to me on November 1, 1991.

You should be advised that while those documents were submitted by Charter International Oil Company, the property at issue was never owned, operated or controlled by Charter International. At the time the document was submitted, legal title to the property was held by NEPCO, Inc., and beneficial title to the property was held by New England Petroleum Corporation. The property was sold by NEPCO, Inc., on behalf of New England Petroleum, to Review Avenue Enterprises, Inc., a New York corporation, having offices at 33 Main Street, Port Washington, New York, on January 27, 1984.

Very truly yours,



Tim E. Sleeth

TES:dmm\33593

PEERLESS PROPERTY, LONG ISLAND CITY, NEW YORK



1P-18

November 19, 1986

1120

Looking southeast at Peerless Property

Photographer: James Lang



1P-19

November 19, 1986

1121

Looking southwest at Peerless Property

Photographer: James Lang